Case 1:20-cv-00889-DAD-JLT Document 30 Filed 10/21/20 Page 1 of 3

1	MARGO A. RAISON, COUNTY COUNSEL		
2	By: Andrew C. Thomson, Chief Deputy (SBN 149057) Marshall S. Fontes, Deputy (SBN 139567)		
3	Kern County Administrative Center		
4	1115 Truxtun Avenue, Fourth Floor Bakersfield, CA 93301		
5	Telephone 661-868-3800 Fax 661-868-3805		
6			
7	Attorneys for Defendant, Donny Youngblood		
8	UNITED STATES DI	STRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA		
10	American Civil Liberties Union of Southern) Case No.: 1:20-CV-00889-DAD-JLT	
11	California, First Amendment Coalition, Kilah)	
12	Oats, Lotisha Davidson, Tanish Brown, Tamecca Spriggs and Janie Randle) STIPULATION AND [PROPOSED]) ORDER TO EXTEND DEFENDANT	
13	Plaintiffs,) YOUNGBLOOD'S RESPONSIVE) PLEADING DEADLINE	
14	v.		
15	Tamarah Harber-Pickens, in her official))	
16	capacity as Court Executive Officer of the Kern County Superior Court, Judith K.))	
17	Dulcich, in her official capacity as Presiding Judge of the Kern County Superior Court,		
18	and Donny Youngblood, Sheriff of Kern))	
19	County, in His Official Capacity,))	
20	Defendants.		
21			
22	Defendant Donny Youngblood in his official capacity as the Sheriff of Kern County		
23	and Plaintiffs, American Civil Liberties Union of Southern California, First Amendment		
24	Coalition, Kilah Oats, Lotisha Davidson, Tanisha Brown, Tameca Spriggs and Janie Randle		
25	hereby stipulate to extend Defendant Youngblood's time to file a responsive pleading until		
26	November 3, 2020.		
27	Good cause exists for this stipulation, in that the Court has recently extended the		
28	responsive pleading time for all other defendants to November 3, 2020, and the filing dead line		
	1		

ACLU of Southern California, et al. v. Tamarah Harber-Pickens, et al. 1:20-CV-00889-DAD-JLT Stipulation and Proposed Order to Extend Defendant Youngblood's Responsive Pleading Deadline

Case 1:20-cv-00889-DAD-JLT Document 30 Filed 10/21/20 Page 2 of 3

1	for the Joint Scheduling Report to November 3, 2020. (Doc. No. 28). Additionally, the parties		
2	have been exploring settlement and believe the additional time would increase the chances of a		
3	quick resolution of this matter.		
4	NOW THEREFORE IT IS STIPULATED AND AGREED, subject to the Court's		
5	approval, as follows:		
6	1. Defendant, Kern County Sheriff Donny Youngblood's deadline to file a		
7	responsive pleading is extended to November 3, 2020.		
8	IT IS SO STIPULATED.		
9	Dated: October 20, 2020	MARGO A. RAISON, COUNTY COUNSEL	
10		By: /s/ Marshall S. Fontes	
11		Andrew C. Thomson, Chief Deputy Marshall S. Fontes, Deputy	
12		Attorneys for Defendant Donny Youngblood, Kern County Sheriff	
13	David Oachar 20, 2020	·	
14	Dated: October 20, 2020	ACLU FOUNDATION OF NORTHERN CALIFORNIA	
15		By: /s/ Kathleen Guneratne as authorized on 10/20/20 Kathleen Guneratne	
16		Amy Gilbert	
17		Attorneys for Plaintiffs ACLU of Southern California, Kilah Oats Lotisha Davidson, Tanisha	
18		Brown, Tameca Spriggs and Janie Randle	
19	Dated: October 20, 2020	AMERICAN CIVIL LIBERTIES UNION OF SOUTHERN CALIFORNIA	
20			
21		By: <u>/s/ Peter Eliasberg as authorized on 10/20/20</u> Peter Eliasberg	
22		Jordan Wells	
23		Attorneys for Plaintiffs, ACLU of Southern California, Kilah Oats Lotisha Davidson, Tanisha	
24		Brown, Tameca Spriggs and Janie Randle	
25	Dated: October 20, 2020	FIRST AMENDMENT COALITION	
26			
27		By: /s/ David Edward Snyder David Edward Snyder	
28		Attorneys for Plaintiff, First Amend. Coalition	
		2	

ACLU of Southern California, et al. v. Tamarah Harber-Pickens, et al. 1:20-CV-00889-DAD-JLT Stipulation and Proposed Order to Extend Defendant Youngblood's Responsive Pleading Deadline

Case 1:20-cv-00889-DAD-JLT Document 30 Filed 10/21/20 Page 3 of 3

1	[PROPOSED] ORDER	
2	Based upon the parties' stipulation, and good cause appearing, the Court orders:	
3	1. Defendant, Kern County Sheriff Donny Youngblood's deadline to file a	
4	responsive pleading is extended to November 3, 2020.	
5		
6	IT IS SO ORDERED.	
7	Dated: October 20, 2020 /s/ Jennifer L. Thurston UNITED STATES MAGISTRATE JUDGE	
8	UNITED STATES MAGISTRATE JUDGE	
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19 20		
20		
22		
23		
24		
25		
26		
27		
28		